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**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION**

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

*\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

**DECLARATION OF RYAN MOONEY  
IN SUPPORT OF MOTION OF THE  
OFFICIAL COMMITTEE OF TORT  
CLAIMANTS PURSUANT TO 11 U.S.C.  
§§ 105(a) AND 501 AND FED. R. BANKR.  
P. 3003(c) FOR ENTRY OF AN ORDER  
EXTENDING THE BAR DATE**

Date: November 13, 2019  
Time: 9:30 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102  
Objection Deadline: November 6, 2019

Steven J. Skikos (SBN 148110)  
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*Attorneys for Declarant*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

<b>In re:</b>	) Bankr. Case No. 19-30088-DM
	)
<b>PG&amp;E CORPORATION</b>	)
	) <b>DECLARATION OF RYAN MOONEY IN</b>
<b>-and-</b>	) <b>SUPPORT OF MOTION TO EXTEND</b>
	) <b>CLAIMS BAR DATE</b>
<b>PACIFIC GAS AND ELECTRIC</b>	)
<b>COMPANY,</b>	) Date: TBD
	) Time: TBD
<b>Debtors.</b>	) Place: United States Bankruptcy Court
	) Courtroom 17, 16th Floor
	) San Francisco, CA 94102
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I, Ryan Mooney, declare as follows:

1. I am over 18 years of age. I have personal knowledge of the facts contained in this declaration, and if called as a witness, I could and would testify competently thereto.
2. My wife and I owned our home on Drendel Circle in Paradise, California. We purchased and moved into the home three months before the Camp Fire destroyed

1 our neighborhood and our entire city. Our aunt and uncle lived a few blocks away,  
2 and they also lost their home.

3 3. On the morning of November 8th, we awoke to the smell of smoke. We saw a wall of  
4 flames coming over the canyon. My wife and I evacuated immediately and barely  
5 escaped. We rushed to my parents' house across town to help them evacuate, as well.  
6 All of us are still grappling with the trauma to this day. We are constantly planning  
7 fire escape routes and putting together emergency kits. When there is smoke outside,  
8 we get nervous. It is difficult for us to talk about the fire.

9 4. After the fire, my wife and I moved from room to room in a hotel for six weeks before  
10 finding an apartment to rent in Chico, California for six months. We now live in a  
11 house in Chico away from our property in Paradise.

12 5. My wife Beth was a high school teacher at a local charter school in Paradise before  
13 the fire. The school burned down, temporarily reopened in Chico, then permanently  
14 closed due to lack of enrollment. Beth lost her job.

15 6. Our home and all our belongings were totally destroyed in the fire. Our 1.3 acres of  
16 land are charred along with a dozen dead, mature trees that cannot be replaced. The  
17 once scenic view from our property now looks out across the scorched canyon and  
18 hilltops.

19 7. We haven't rebuilt, but we would like to do so. We don't have the money, and we  
20 don't know what to do because the community is gone, the areas around are destitute,  
21 and the property values have dropped. I would like for my community to be rebuilt  
22 but that hasn't even started.

23 8. Our house was insured and I've had at least 20 phone calls with our agents. They  
24 never disclosed that my insurer was seeking reimbursement from PG&E in the  
25 bankruptcy for payments it made to us or that we had the right to pursue our own  
26 claim against PG&E for our losses and emotional distress. Our insurance claim is  
27 still open. I recently learned that the insurance companies in this bankruptcy  
28

1 settled for around \$10 billion and that was insulting and frustrating to me because  
2 my insurer is taking so long to settle our insurance claim.

3 9. I also did not know we could recover money from PG&E for our losses. I do not  
4 recall receiving any notice through the mail or a phone call from PG&E regarding  
5 our rights in the bankruptcy. I became aware that there is money available in this  
6 case through Facebook. I saw attorney commercials on television, but they didn't  
7 mean anything to me. Had I not luckily learned about this through Facebook, I never  
8 would have filed a claim.

9 10. I now have an attorney. I now intend to pursue a claim to cover all our damages.

10 11. I submit this declaration because I believe there are countless people who like me  
11 don't know that they should be filing claims in this bankruptcy or what they will lose  
12 if they don't. I feel horrible for these people, and I ask the court to do something to  
13 let them participate too.

14 I declare under penalty of perjury that the foregoing is true and correct. Executed this  
15 6<sup>th</sup> day of October, 2019 in Chico, California.

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19 Ryan Mooney  
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